

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

PAULETTE HOLMES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 3:21-cv-00578-ECM
	)	
FRESENIUS KIDNEY CARE	)	
OF TUSKEGEE, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT’S EVIDENTIARY SUBMISSION IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT**

Defendant Bio-Medical Applications of Alabama, Inc. d/b/a Fresenius Kidney Care Tuskegee (“BMA”) submits the following evidentiary materials in support of its motion for summary judgment and supporting memorandum:

1. **Exhibit 1** – BMA’s Verified Discovery Responses
2. **Exhibit 2** – Plaintiffs’ Verified Interrogatory Answers
3. **Exhibit 3** – Deposition Testimony of Steven Holmes
4. **Exhibit 4** – Deposition Testimony of Paulette Holmes
5. **Exhibit 5** – Deposition Testimony of Felicia Butler, RN

Respectfully submitted:

/s/ Leigh Anne Hodge

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## CERTIFICATE OF SERVICE

This is to certify that on September 20, 2023 the foregoing document was filed with the Clerk of Court using the CM/ECF electronic filing system, which will serve the following counsel of record:

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